

FILED
UNITED STATES DISTRICT COURT
CLERKS OFFICE
DISTRICT OF MASSACHUSETTS

2004 OCT 29 P 1:21

UNITED STATES OF AMERICA

v.

DAVID C. ARNDT

U.S. DISTRICT COURT
DISTRICT OF MASS.

Criminal No. 04-CR-10166-RGS

DEFENDANT, DAVID C. ARNDT'S MOTION TO COMPEL DISCLOSURE

The Defendant, David Arndt ("Defendant"), moves that the Court compel the government to provide forthwith the following categories of mandatory discovery:

1. The names of the unindicted co-conspirators;
2. The non-redacted government interviews of witnesses identified as CW#1 through CW5;
3. The names of the individuals to whom the government has given promises, rewards and inducements;
4. The names of the speakers in the recorded conversations referenced in CD-ROM N-20 and tape N-21; and
5. The identities of the individuals depicted on the photo arrays shown to CW#1 through CW#5.

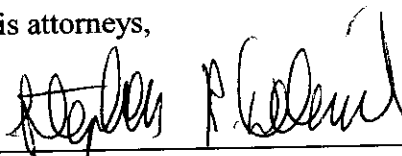
The reasons for this motion are included in the Defendant's Memorandum of Law filed herewith.

A good faith attempt was made to eliminate or narrow the issues raised in this motion through a conference with counsel for the government.

Respectfully submitted,

DAVID C. ARNDT,

By his attorneys,



Stephen R. Delinsky (BBO# 119120)

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Dated: October 29, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney(s) of record for each party by mail (hand) on 10-29-04.

SR Delinsky